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COUNSEL FOR DEBTOR AND
DEBTOR-IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

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|-------------------------------------|---|---------------------------------|
| In Re: | § | Chapter No.: 11 |
| | § | |
| Angaraka Limited Partnership | § | Case No.: 10-33868-sgj11 |
| | § | |
| Debtor. | § | |

**AGREED THIRD MOTION TO CONTINUE HEARING ON
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS' MOTION TO
DISMISS CASE WITH PREJUDICE
*RELATES TO [DOCKET NO. 105]***

The Debtor and Debtor in Possession herein (the “Debtor”), by its undersigned counsel, hereby files this third motion to continue the hearing (the “Hearing Date”) relating the motion of the Texas Comptroller of Public Accounts (“Comptroller”) requesting dismissal of this case with prejudice, dated February 28, 2011 [Docket No. 105] (the “Motion to Dismiss”), and respectfully states as follows:

1. On May 31, 2010 (the “Petition Date”), the Debtor commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

2. The Debtor remains in possession of its assets and continues to operate and manage its business as a debtor in possession pursuant to Bankruptcy Code sections 1107 and 1108.

3. No trustee or examiner has been appointed.

4. On September 28, 2010, the Debtor filed its Chapter 11 Plan of Reorganization [Dkt. No. 65] (the “Plan”). A hearing to approve the Plan (the “Confirmation Hearing”) that was set for April 25, 2011, has been continued by the Court until June 16, 2011 at 9:30 a.m.

5. The Comptroller filed its Motion to Dismiss requesting the dismissal of this case on February 28, 2011 [Dkt. No. 105]. The Debtor filed a response to the Motion to Dismiss on March 21, 2011 [Dkt. No. 110] (the “Response”).

6. Since the filing of the Motion to Dismiss, the Debtor filed a motion to continue the hearing [Dkt. No. 114] (the “First Motion to Continue”) on the Motion to Dismiss until the Confirmation Hearing on the grounds that the issues raised in the Motion to Dismiss would be resolved on or before the Confirmation Hearing. The Court granted, and the Comptroller agreed to, the continuance in the April 5, 2011 Agreed Order [Dkt. No. 115]. The Confirmation Hearing was subsequently continued, and the Court granted an agreed second motion to continue the Hearing Date on May 4, 2011 [Dkt. No. 129]. The Hearing Date is presently set for June 16, 2011.

7. The Confirmation Hearing has now been continued until July 25, 2011 at 10:30 a.m. [Dkt. No. 139]. The Hearing Date for the Motion to Dismiss should therefore also be continued and reset for the same date as the Confirmation Hearing. As set forth in the Response and the First Motion to Continue, the issues raised by the Comptroller in the Motion to Dismiss could be resolved on or before the Confirmation Hearing. Therefore, a hearing on the Motion to

Dismiss at this point is premature, and the Hearing Date should therefore be continued to coincide with the Confirmation Hearing.

8. Debtor's counsel has discussed a continuance on these grounds with the Comptroller, and the Comptroller has no objection to the relief sought herein.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that this Court (i) grant the relief requested in this motion, (ii) continue the hearing on the Motion to Dismiss until July 25, 2011 at 10:30 a.m. to coincide with the Confirmation Hearing, and (iii) grant the Debtor such other and further relief, both at law and in equity, which is just and proper.

Date: May 25, 2011

Respectfully submitted,

Dallas, Texas

DLA PIPER LLP (US)

By: /s/ J. Seth Moore
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Attorneys for the Debtor
and Debtor in Possession

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served this 28 day of April, 2011 to the Texas Comptroller of Public Accounts, the Debtor's secured creditor, all notice of appearance parties, and the United States Trustee by ECF notification and/or U.S. mail.

/s/ J. Seth Moore

J. Seth Moore